

29

FILED IN OPEN COURT

JDR/GFM

JUN 27 2024

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

CHRISTOPHER L. EKMAN, CLERK

UNITED STATES OF AMERICA

v.

GLENNIE ANTONIO McGEE,
aka "LITTLE G,"
aka "LITTLE MAN,"
ECHANDZA DIANCA MAXIE,
aka "CHAN,"
ERIC ANTHONY AGUILAR,

ANTONIO DWONE REED,
aka "HERT,"
TIERRA TOCORRA HILL,
aka "LIERRA,"
WILLIAM THOMAS AGEE, JR., and
TAVARIS LAMON BODY,
aka "TRICK"

*
*
*
*
*
*
*
*
*
*
*
*
*
*
*
*
*
*
*
*
*

CRIM. NO. 24-112-TFM

MAG. NO. 24-180

USAO NO. 24R00064

OCDETF NO. SE-ALS-0128

VIOLATIONS: 21 U.S.C. § 848(a)
21 U.S.C. § 846
18 U.S.C. § 924(c)(1)(A)(i)
18 U.S.C. § 922(g)(1)
21 U.S.C. § 841(a)(1)
21 U.S.C. § 861(a)(2)
18 U.S.C. § 1512(c)(1)
18 U.S.C. § 922(d)(1)

FILED UNDER SEAL

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
Continuing Criminal Enterprise
Title 21, United States Code, Section 848(a)

From in or about June 2017, and continuing through on or about June 13, 2024, the exact dates being unknown, in the Southern District of Alabama, and elsewhere, the defendant,

GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN,"
did unlawfully, knowingly, and intentionally engage in a continuing criminal enterprise in that he unlawfully, knowingly, and intentionally violated Title 21, United States Code, Sections 846, 841(a)(1), and 861, which violations include but are not limited to the violations alleged in

SEALED

Count Two (Conspiracy to Possess with Intent to Distribute Cocaine), Count Three (Conspiracy to Possess with Intent to Distribute Fentanyl), Count Six (Distribution of Fentanyl), Count Seven (Possession with Intent to Distribute Cocaine), Count Eight (Use of Persons Under 18 Years of Age in Drug Operations), and Count Ten (Possession with Intent to Distribute Cocaine), which counts are incorporated herein by reference as though fully set forth in this Count, and which violations were part of a continuing series of violations of the Controlled Substances Act, Title 21, United States Code, Section 801, *et seq.*, undertaken by the defendant, **GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN,"** in concert with at least five other persons with respect to whom the defendant, **GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN,"** occupied a position of organizer, supervisor, and any position of management, and from which such continuing series of violations the defendant, **GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN,"** obtained substantial income and resources.

In violation of Title 21, United States Code, Section 848(a).

COUNT TWO
Conspiracy to Possess with Intent to Distribute Cocaine
Title 21, United States Code, Section 846

From in or about June 2017, and continuing through on or about June 13, 2024, the exact dates being unknown, in the Southern District of Alabama, and elsewhere, the defendants,

GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN,"
ECHANDZA DIANCA MAXIE, aka "CHAN,"
ERIC ANTHONY AGUILAR,

ANTONIO DWONE REED, aka "HERT,"
TIERRA TOCORRA HILL, aka "LIERRA,"
WILLIAM THOMAS AGEE, JR., and
TAVARIS LAMON BODY, aka "TRICK,"

knowingly and intentionally conspired with one another and with other persons, both known and

unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute cocaine, a schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 846.

The quantity of cocaine attributable to the defendants in the conspiracy is more than 5 kilograms; therefore, the penalty provisions of Title 21, United States Code, Section 841(b)(1)(A) apply.

COUNT THREE
Conspiracy to Possess with Intent to Distribute Fentanyl
Title 21, United States Code, Section 846

From in or about December 2023, and continuing through on or about June 13, 2024, the exact dates being unknown, in the Southern District of Alabama, and elsewhere, the defendants,

GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN," and
TIERRA TOCORRA HILL, aka "LIERRA,"

knowingly and intentionally conspired with one another and with other persons, both known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 846.

The quantity of mixture and substance containing a detectable amount of fentanyl attributable to the defendants in the conspiracy is more than 400 grams; therefore, the penalty provisions of Title 21, United States Code, Section 841(b)(1)(A) apply.

COUNT FOUR

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
Title 18, United States Code, Section 924(c)(1)(A)(i)

On or about December 21, 2022, in the Southern District of Alabama, the defendant,

GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN,"

knowingly possessed a firearm, namely, a Century Arms, model Draco, 7.62x39mm caliber pistol, serial number PMD-18449-20, in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, Continuing Criminal Enterprise in violation of Title 21, United States Code, Section 848(a), as alleged in Count One of this Indictment; and Conspiracy to Possess with Intent to Distribute Cocaine in violation of Title 21, United States Code, Section 846, as alleged in Count Two of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT FIVE

Possession of a Firearm by a Prohibited Person (Felon)
Title 18, United States Code, Section 922(g)(1)

On or about December 21, 2022, in the Southern District of Alabama, the defendant,

GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN,"

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, namely, Shooting into an Occupied Dwelling on or about April 17, 2006, in the Circuit Court of Mobile County, Alabama, case number CC-2006-000241; Shooting into an Occupied Vehicle on or about April 17, 2006, in the Circuit Court of Mobile County, Alabama, case number CC-2006-000242; and Distribution and Possession with Intent to Distribute Crack Cocaine on or about November 21, 2006, in the United States District Court for the Southern District of Alabama, case number 1:06-cr-00211-CG, did knowingly possess, in and affecting commerce, a firearm, namely, a Century Arms, model Draco, 7.62x39mm caliber pistol,

serial number PMD-18449-20.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT SIX
Distribution of Fentanyl
Title 21, United States Code, Section 841(a)(1)

On or about February 17, 2024, in the Southern District of Alabama, the defendant,

GLENNIE ANTONIO McGEE, aka “LITTLE G,” aka “LITTLE MAN,”

knowingly and intentionally distributed approximately 105 grams of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

The quantity of mixture and substance containing a detectable amount of fentanyl involved in the offense is more than 40 grams; therefore, the penalty provisions of Title 21, United States Code, Section 841(b)(1)(B) apply.

COUNT SEVEN
Possession with Intent to Distribute Cocaine
Title 21, United States Code, Section 841(a)(1)

On or about March 30, 2024, in the Southern District of Alabama, and elsewhere, the defendants,

GLENNIE ANTONIO McGEE, aka “LITTLE G,” aka “LITTLE MAN,” and
TIERRA TOCORRA HILL, aka “LIERRA,”

aided and abetted by one another and by other persons, both known and unknown to the Grand Jury, knowingly and intentionally possessed with intent to distribute approximately 4.1 kilograms of cocaine, a schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States

Code, Section 2.

The quantity of cocaine involved in the offense is more than 500 grams; therefore, the penalty provisions of Title 21, United States Code, Section 841(b)(1)(B) apply.

COUNT EIGHT
Use of Persons Under 18 Years of Age in Drug Operations
Title 21, United States Code, Section 861(a)(2)

On or about March 30, 2024, in the Southern District of Alabama, the defendant,

GLENNIE ANTONIO McGEE, aka “LITTLE G,” aka “LITTLE MAN,”

knowingly and intentionally used, persuaded, induced, and enticed a person under eighteen years of age to assist in avoiding detection and apprehension for an offense under Title 21, United States Code, Chapter 13, subchapter I, namely, Continuing Criminal Enterprise in violation of Title 21, United States Code, Section 848(a), as alleged in Count One of this Indictment; Conspiracy to Possess with Intent to Distribute Cocaine in violation of Title 21, United States Code, Section 846, as alleged in Count Two of this Indictment; and Possession with Intent to Distribute Cocaine in violation of Title 21, United States Code, Section 841(a)(1), as alleged in Count Seven of this Indictment, by Federal, State, and local law enforcement officials.

In violation of Title 21, United States Code, Section 861(a)(2).

COUNT NINE
Possession of a Firearm in Furtherance of a Drug Trafficking Crime
Title 18, United States Code, Section 924(c)(1)(A)(i)

On or about March 30, 2024, in the Southern District of Alabama, the defendant,

TIERRA TOCORRA HILL, aka “LIERRA,”

knowingly possessed a firearm, namely, a Sig Sauer, model P365, 9mm caliber pistol, serial number 66B497251; a Taurus, model G3, 9mm caliber pistol, serial number ACM660262; and a Bersa, model Thunder 9 Ultra Compact Pro, 9mm caliber pistol, serial number E27670, in

furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, Conspiracy to Possess with Intent to Distribute Cocaine in violation of Title 21, United States Code, Section 846, as alleged in Count Two of this Indictment; and Possession with Intent to Distribute Cocaine in violation of Title 21, United States Code, Section 841(a)(1), as alleged in Count Seven of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT TEN
Possession with Intent to Distribute Cocaine
Title 21, United States Code, Section 841(a)(1)

On or about June 13, 2024, in the Southern District of Alabama, and elsewhere, the defendants,

GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN,"
ERIC ANTHONY AGUILAR,
ANTONIO DWONE REED, aka "HERT," and
WILLIAM THOMAS AGEE, JR.,

aided and abetted by one another and by other persons, both known and unknown to the Grand Jury, knowingly and intentionally possessed with intent to distribute approximately 5 kilograms of cocaine, a schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

The quantity of cocaine involved in the offense is more than 5 kilograms; therefore, the penalty provisions of Title 21, United States Code, Section 841(b)(1)(A) apply.

COUNT ELEVEN
Tampering with Evidence
Title 18, United States Code, Section 1512(c)(1)

On or about June 13, 2024, in the Southern District of Alabama, the defendant,

ECHANDZA DIANCA MAXIE, aka “CHAN,”

aided and abetted by other persons, both known and unknown to the Grand Jury, did corruptly attempt to conceal an object, namely, a Ruger, model LC 380, .380 Auto caliber pistol, serial number 326-19327; a rose gold Cartier bracelet; a diamond chain and “Belle” pendant; a diamond heart pendant; a rose gold and diamond necklace; two yellow gold and diamond necklaces; a yellow gold and diamond bracelet; a white gold and diamond bracelet; a rose gold Rolex Day-Date watch; a white and rose gold diamond-encrusted Rolex Datejust watch; and a white and rose gold diamond-encrusted Patek Philippe watch, with the intent to impair the object’s integrity and availability for use in an official proceeding, namely, the investigation and prosecution of the offenses in violation of Title 21, United States Code, Sections 848(a), 846, and 841(a)(1) alleged in Counts One, Two, Three, and Ten of this Indictment.

In violation of Title 18, United States Code, Section 1512(c)(1) and Title 18, United States Code, Section 2.

COUNT TWELVE
Disposal of a Firearm to a Prohibited Person (Felon)
Title 18, United States Code, Section 922(d)(1)

On or about June 13, 2024, in the Southern District of Alabama, the defendant,

ECHANDZA DIANCA MAXIE, aka “CHAN,”

knowingly disposed of a firearm, namely, a Ruger, model LC 380, .380 Auto caliber pistol, serial number 326-19327, to an individual identified herein as “E.D.M.,” whose identity is known to the Grand Jury, knowing and having reasonable cause to believe that E.D.M. had been convicted of a

crime punishable by imprisonment for a term exceeding one year.

In violation of Title 18, United States Code, Section 922(d)(1).

SENTENCING ALLEGATIONS
Second and Subsequent Penalties
Title 21, United States Code, Section 841

The defendant,

GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN,"

has been previously convicted of a serious drug felony as follows: on or about November 21, 2006, case number 1:06-cr-00211-CG, in the United States District Court for the Southern District of Alabama, for Distribution and Possession with Intent to Distribute Crack Cocaine, a Class B felony under federal law, for which the defendant served more than 12 months' imprisonment and the defendant's release from such imprisonment was within 15 years of the commencement of the instant offenses.

Therefore, the defendant is subject to the second and subsequent penalty provision of Title 21, United States Code, Section 841(b)(1)(A), (B), and (C) upon conviction for any of the offenses alleged in Counts Two, Three, Six through Eight, and Ten of this Indictment.

FORFEITURE NOTICE

The allegations contained in Counts One through Twelve of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d), Title 18, United States Code, Section 981(a)(1)(C), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c).

Upon conviction of the offenses in violation of Title 21, United States Code, Sections 848(a), 846, 841(a)(1), and 861(a)(2) set forth in Counts One through Three, Six through Eight, and Ten of this Indictment, the defendants,

**GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN,"
ECHANDZA DIANCA MAXIE, aka "CHAN,"
ERIC ANTHONY AGUILAR,**

**ANTONIO DWONE REED, aka "HERT,"
TIERRA TOCORRA HILL, aka "LIERRA,"
WILLIAM THOMAS AGEE, JR., and
TAVARIS LAMON BODY, aka "TRICK,"**

shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses or any property real or personal which constitutes or is derived from proceeds traceable to the offenses. The property to be forfeited includes, but is not limited to, the following:

1. The real property located at 2471 Raspberry Lane, Mobile, Alabama 36695;
2. The real property located at 1456 Ohio Street, Mobile, Alabama 36604;
3. The real property located at 621 Euclid Avenue, Mobile, Alabama 36606;
4. The real property located at 1318 Hercules Street, Mobile, Alabama 36603;
5. The real property located at 1680 Darwood Drive, Mobile, Alabama 36605;
6. The real property located at 1516 Orange Street, Mobile, Alabama 36605;
7. The real property located at 1766 Le Grande Drive, Mobile, Alabama 36618;
8. The real property located at 1167 Terrell Road, Mobile, Alabama 36605;
9. Lot 12 Deer Landing, Mobile, Alabama, Mobile County parcel number

- 340306000008112;
10. A 2021 Dodge Durango SRT Hellcat, Vehicle Identification Number (“VIN”) 1C4SDJH96MC791225, seized from defendants **GLENNIE ANTONIO McGEE, aka “LITTLE G,” aka “LITTLE MAN,”** and **ECHANDZA DIANCA MAXIE, aka “CHAN”;**
 11. A 2021 Cadillac Escalade, VIN 1GYS4FKLXMR378278, seized from defendant seized from defendants **GLENNIE ANTONIO McGEE, aka “LITTLE G,” aka “LITTLE MAN,”** and **ECHANDZA DIANCA MAXIE, aka “CHAN”;**
 12. A 2017 Lexus RX 350, VIN 2T2BZMCA6HC091217, seized from defendants **GLENNIE ANTONIO McGEE, aka “LITTLE G,” aka “LITTLE MAN,”** and **ECHANDZA DIANCA MAXIE, aka “CHAN”;**
 13. A 2015 Ford Explorer, VIN 1FM5K8GT6FGA65848, seized from defendant **ANTONIO DWONE REED, aka “HERT”;**
 14. A 1995 Chevrolet Impala SS, VIN 1G1BL52P9SR162711, seized from defendant **WILLIAM THOMAS AGEE, JR.;**
 15. \$23,379, more or less, in United States currency, seized from defendant **ERIC ANTHONY AGUILAR;**
 16. A Century Arms, model Draco, 7.62x39mm caliber pistol, serial number PMD-18449-20, seized from defendants **GLENNIE ANTONIO McGEE, aka “LITTLE G,” aka “LITTLE MAN,”** and **ECHANDZA DIANCA MAXIE, aka “CHAN”;**

17. A Sig Sauer, model P365, 9mm caliber pistol, serial number 66B497251, seized from defendant **TIERRA TOCORRA HILL, aka "LIERRA";**
18. A Taurus, model G3, 9mm caliber pistol, serial number ACM660262, seized from defendant **TIERRA TOCORRA HILL, aka "LIERRA";**
19. A Bersa, model Thunder 9 Ultra Compact Pro, 9mm caliber pistol, serial number E27670, seized from defendant **TIERRA TOCORRA HILL, aka "LIERRA";**
20. A Smith & Wesson, model SD9VE, 9mm caliber pistol, serial number FWS4899, seized from defendant **WILLIAM THOMAS AGEE, JR.;**
21. An RG Industries, model RG 31, .32 caliber revolver, serial number Q110299, seized from defendant **WILLIAM THOMAS AGEE, JR.;**
22. A Romarm/Cugir, model Micro Draco, 7.62x39mm caliber pistol, serial number PMD-16516-19-RO, seized from defendant **WILLIAM THOMAS AGEE, JR.;**
23. A Ruger, model LC 380, .380 Auto caliber pistol, serial number 326-19327, seized from defendants **GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN," and ECHANDZA DIANCA MAXIE, aka "CHAN";**
24. A rose gold Cartier bracelet seized from defendants **GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN," and ECHANDZA DIANCA MAXIE, aka "CHAN";**
25. A diamond chain and "Belle" pendant seized from defendants **GLENNIE**

ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN," and ECHANDZA DIANCA MAXIE, aka "CHAN";

26. A diamond heart pendant seized from defendants GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN," and ECHANDZA DIANCA MAXIE, aka "CHAN";
27. A rose gold and diamond necklace seized from defendants GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN," and ECHANDZA DIANCA MAXIE, aka "CHAN";
28. Two yellow gold and diamond necklaces seized from defendants GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN," and ECHANDZA DIANCA MAXIE, aka "CHAN";
29. A yellow gold and diamond bracelet seized from defendants GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN," and ECHANDZA DIANCA MAXIE, aka "CHAN";
30. Two white gold and diamond bracelets seized from defendants GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN," and ECHANDZA DIANCA MAXIE, aka "CHAN";
31. A rose gold Rolex Day-Date watch seized from defendants GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN," and ECHANDZA DIANCA MAXIE, aka "CHAN";
32. A white and rose gold diamond-encrusted Rolex Datejust watch seized from defendants GLENNIE ANTONIO McGEE, aka "LITTLE G," aka

- “LITTLE MAN,” and ECHANDZA DIANCA MAXIE, aka “CHAN”;**
33. A white and rose gold diamond-encrusted Patek Philippe watch seized from defendants **GLENNIE ANTONIO McGEE, aka “LITTLE G,” aka “LITTLE MAN,” and ECHANDZA DIANCA MAXIE, aka “CHAN”;**
34. A white gold diamond and jewel-encrusted necklace and Jesus pendant with “Cream” on the clasp seized from defendants **GLENNIE ANTONIO McGEE, aka “LITTLE G,” aka “LITTLE MAN,” and ECHANDZA DIANCA MAXIE, aka “CHAN”;**
35. A rose gold diamond and jewel-encrusted necklace and Jesus pendant with “Cream” on the clasp seized from defendants **GLENNIE ANTONIO McGEE, aka “LITTLE G,” aka “LITTLE MAN,” and ECHANDZA DIANCA MAXIE, aka “CHAN”;**
36. A white gold diamond-encrusted Cuban link necklace and “Cream” pendant seized from defendants **GLENNIE ANTONIO McGEE, aka “LITTLE G,” aka “LITTLE MAN,” and ECHANDZA DIANCA MAXIE, aka “CHAN”;**
37. A white gold diamond-encrusted Audemars Piguet watch seized from defendants **GLENNIE ANTONIO McGEE, aka “LITTLE G,” aka “LITTLE MAN,” and ECHANDZA DIANCA MAXIE, aka “CHAN”;**
38. A white gold diamond-encrusted Cuban link necklace seized from defendants **GLENNIE ANTONIO McGEE, aka “LITTLE G,” aka “LITTLE MAN,” and ECHANDZA DIANCA MAXIE, aka “CHAN”;**

39. A white gold and diamond "Cream" bracelet seized from defendants **GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN,"** and **ECHANDZA DIANCA MAXIE, aka "CHAN";** and
40. MONEY JUDGMENT: A sum of money in United States currency of \$1,680,000, more or less, that defendants **GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN,"** and **ECHANDZA DIANCA MAXIE, aka "CHAN,"** obtained as a result of the offenses charged in Counts One through Three, Six through Eight, and Ten of this Indictment.

Upon conviction of the offenses in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 922(g)(1) set forth in Counts Four and Five of this Indictment, the defendant,

GLENNIE ANTONIO McGEE, aka "LITTLE G," aka "LITTLE MAN,"
shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 922(g)(1), including, but not limited to:

1. A Century Arms, model Draco, 7.62x39mm caliber pistol, serial number PMD-18449-20.

Upon conviction of the offense in violation of Title 18, United States Code, Section 924(c)(1)(A)(i) set forth in Count Nine of this Indictment, the defendant,

TIERRA TOCORRA HILL, aka "LIERRA,"
shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in

any knowing violation of Title 18, United States Code, Section 924(c)(1)(A)(i), including, but not limited to:

1. A Sig Sauer, model P365, 9mm caliber pistol, serial number 66B497251;
2. A Taurus, model G3, 9mm caliber pistol, serial number ACM660262; and
3. A Bersa, model Thunder 9 Ultra Compact Pro, 9mm caliber pistol, serial number E27670.

Upon conviction of the offense in violation of Title 18, United States Code, Section 922(d)(1) set forth in Count Twelve of this Indictment, the defendant,

ECHANDZA DIANCA MAXIE, aka "CHAN,"

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 922(d)(1), including, but not limited to:

1. A Ruger, model LC 380, .380 Auto caliber pistol, serial number 326-19327.

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All pursuant to Title 18, United States Code, Section 924(d), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c).

A TRUE BILL

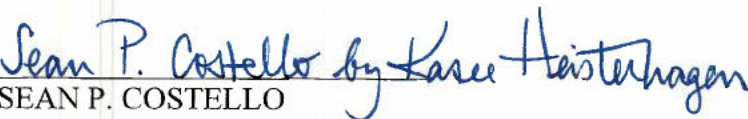
FOR PERSON UNITED STATES GRAND JURY
SOUTHERN DISTRICT OF ALABAMA

SEAN P. COSTELLO
UNITED STATES ATTORNEY

By:


JUSTIN D. ROLLER
Assistant United States Attorney


GEORGE F. MAY
Assistant United States Attorney


SEAN P. COSTELLO
United States Attorney

JUNE 2024



PENALTY PAGE

CASE STYLE: UNITED STATES v. GLENNIE ANTONIO McGEE, et al.

DEFENDANTS: GLENNIE ANTONIO McGEE (COUNTS 1–8, 10)
ECHANDZA DIANCA MAXIE (COUNTS 2, 11, 12)
ERIC ANTHONY AGUILAR (COUNTS 2, 10)

ANTONIO DWONE REED (COUNTS 2, 10)
TIERRA TOCORRA HILL (COUNTS 2, 3, 7, 9)
WILLIAM THOMAS AGEE, JR. (COUNTS 2, 10)
TAVARIS LAMON BODY (COUNT 2)

MAG. NO.: 24-180

USAO NO.: 24R00064

OCDETF NO.: SE-ALS-0128

AUSAs: Justin D. Roller
George F. May

CODE VIOLATIONS:

COUNT 1: 21 U.S.C. § 848(a), Continuing Criminal Enterprise

COUNT 2: 21 U.S.C. § 846, Conspiracy to Possess with Intent to Distribute Cocaine

COUNT 3: 21 U.S.C. § 846, Conspiracy to Possess with Intent to Distribute Fentanyl

COUNTS 4, 9: 18 U.S.C. § 924(c)(1)(A)(i), Possession of a Firearm in Furtherance of a Drug Trafficking Crime

COUNT 5: 18 U.S.C. § 922(g)(1), Possession of a Firearm by a Prohibited Person (Felon)

COUNT 6: 21 U.S.C. § 841(a)(1), Distribution of Fentanyl

COUNTS 7, 10: 21 U.S.C. § 841(a)(1), Possession with Intent to Distribute Cocaine

COUNT 8: 21 U.S.C. § 861(a)(2), Use of Persons Under 18 Years of Age in Drug Operations

SEALED

COUNT 11: 18 U.S.C. § 1512(c)(1), Tampering with Evidence

COUNT 12: 18 U.S.C. § 922(d)(1), Disposal of a Firearm to a Prohibited Person (Felon)

PENALTIES:

COUNT 1: 20 yrs minimum to life/\$20,000,000/5 yrs minimum to life SRT/\$100 SA

COUNTS 2, 3, 10: 10 yrs minimum to life/\$10,000,000/5 yrs minimum to life SRT/\$100 SA
(2nd and sub. 15 yrs minimum to life/\$20,000,000/10 yrs minimum to life SRT/\$100 SA)
(3rd and sub. 25 yrs minimum to life/\$20,000,000/10 yrs minimum to life SRT/\$100 SA)

COUNTS 4, 9: 5 yrs statutory minimum mandatory consecutive to life/\$250,000/5 yrs SRT/\$100 SA

COUNT 5: 15 yrs/\$250,000/3 yrs SRT/\$100 SA
(statutory minimum mandatory 15 yrs (to life) and 5 yrs SRT, if subject to provisions of 18 U.S.C. § 924(e))

COUNTS 6, 7: 5 yrs minimum to 40 yrs/\$5,000,000/4 yrs minimum to life SRT/\$100 SA
(2nd and sub. 10 yrs minimum to life/\$8,000,000/8 yrs minimum to life SRT/\$100 SA)

COUNT 8: 20 yrs minimum to life/\$20,000,000/10 yrs minimum to life SRT/\$100 SA

COUNT 11: 20 yrs/\$250,000/3 yrs SRT/\$100 SA

COUNT 12: 15 yrs/\$250,000/3 yrs SRT/\$100 SA

FORFEITURE NOTICE: Forfeiture of Property

SEALED